

EXHIBIT A

**PREVIOUSLY FILED (ECF No.2);
SEALED PER COURT ORDER (ECF No. 6)**

EXHIBIT B

**PREVIOUSLY FILED (ECF No.2);
SEALED PER COURT ORDER (ECF No. 6)**

EXHIBIT C

Angelo J. Genova

From: Fitzgerald, Michael <Michael.Fitzgerald@co.monmouth.nj.us>
Sent: Thursday, November 30, 2017 12:17 PM
To: Angelo J. Genova
Subject: Resolutions for Public Meeting

Angelo,

In keeping with our past practice the following was just sent to the Freeholders via e mail. I would respectfully request that you share the content with Freeholder Curley.

Freeholders,

Please be advised that there will be two resolutions considered during the public portion of the meeting on Monday. The Resolutions to be considered are:

1. A resolution to update, expand, and reinforce the Monmouth County policy on "Prohibiting Workplace Discrimination and Harassment"; and,
2. A resolution of censure of County Freeholder John P Curley by the Board of Chosen Freeholders of the County of Monmouth, State of New Jersey.

The Clerk of the Board will handle sending out the notice for publication before 1 P.M.

Michael D. Fitzgerald, Esq.
Monmouth County Counsel

Hall of Records, Room 236
One East Main Street
Freehold, NJ 07728
Phone: 732-683-8640
Fax: 732-431-0437

Email: Michael.Fitzgerald@co.monmouth.nj.us

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EXHIBIT D

From: Fitzgerald, Michael [mailto:Michael.Fitzgerald@co.monmouth.nj.us]
Sent: Thursday, November 30, 2017 11:23 AM
To: Angelo J. Genova <AGenova@genovaburns.com>
Subject: Freeholder Curley

Angelo,

I see that Freeholder Curley is parked at the Hall of Records. Can you please share the Freeholder business being attended to by the Freeholder?

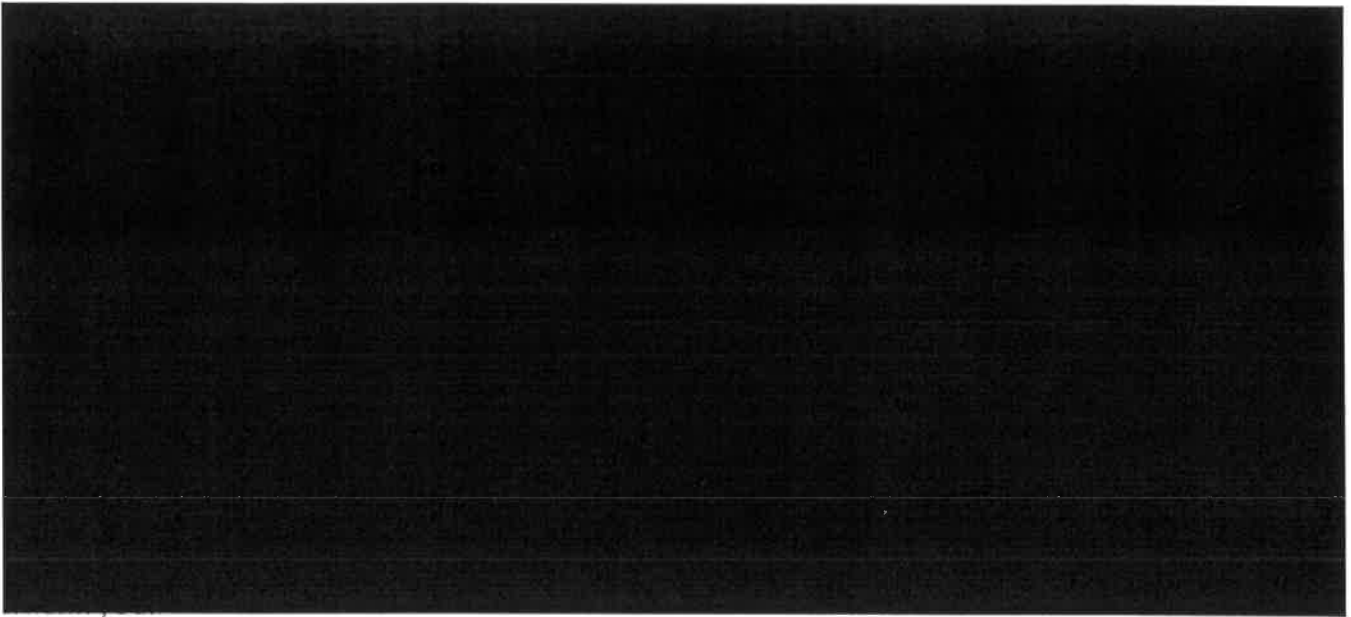
Michael D. Fitzgerald, Esq.
Monmouth County Counsel

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EXHIBIT E



From: Jonathan Testa [<mailto:jtesta@omlawpc.com>]
Sent: Thursday, December 07, 2017 6:03 PM
To: Angelo J. Genova <AGenova@genovaburns.com>
Cc: Fitzgerald, Michael <Michael.Fitzgerald@co.monmouth.nj.us>
Subject: Executive Session 12-8-17

Dear Mr. Genova: Please be advised that the procedure for tomorrow's executive session will be as follows: (1) presentation by Judge Cuff; (2) 30 minute period for comments, submissions, and statements offered by Freeholder Curley either individually or through counsel; and (3) 30 minute period of comments, submissions, and public statements by the other Freeholders. Robert's Rules of Order govern the internal manner and procedure of all meetings, where not otherwise governed by New Jersey law.

Please be guided accordingly.

Truly,

Jonathan Testa, Esq.
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EXHIBIT F

**A RESOLUTION OF CENSURE OF COUNTY FREEHOLDER JOHN P. CURLEY BY
THE BOARD OF CHOSEN FREEHOLDERS OF THE COUNTY OF MONMOUTH,
STATE OF NEW JERSEY**

WHEREAS, the Board of Chosen Freeholders, as elected officials, are fiduciaries and trustees of the public; and are obligated to discharge their duties to the public honorably and with the highest fidelity, integrity, and professionalism; and

WHEREAS, according to a 2017 study conducted by Rutgers University's Center for American Women and Politics only 38, or 27.7%, of the 137 County Freeholders in New Jersey are women; and

WHEREAS, the Board of Chosen Freeholders and the residents of this County are truly privileged to have dedicated women who have devoted their lives to faithfully serving the public with distinction and the utmost integrity across all levels of government, and throughout all County Departments and Divisions; and

WHEREAS, the Board of Chosen Freeholders are the primary policymakers for the County of Monmouth, and serve as leaders in their communities as well as the County workplace; and

WHEREAS, it is the policy of the County to ensure that discrimination and harassment by anyone shall not be tolerated, in the workplace or otherwise; and that all employees shall be able to enjoy a work environment free of every form of discrimination and harassment; and

WHEREAS, the Board of Chosen Freeholders and all officers and employees of the County are responsible for carrying out and abiding by this policy against discrimination and harassment, and ensuring that the workplace is free from discrimination based on race, creed, color, religion, national origin, ancestry, age, sex, marital status, familial status, affectional or sexual orientation and any other classifications protected by law; and

WHEREAS, sexual harassment is a form of gender discrimination; and the Board of Chosen Freeholders forbids offensive and/or inappropriate behavior that may form the basis of sexual harassment, a hostile work-environment, or other forms of discrimination; such behavior will not be tolerated under any circumstance at any level of County government, regardless of whether such conduct is attributed to the lowest level County employee or the highest-ranking elected County official(s); and

WHEREAS, the Board of Chosen Freeholders finds that whenever such offensive and/or inappropriate behavior is directly or indirectly attributed to, or alleged against, any Freeholder, such conduct will not be ignored and must be addressed and remedied. Such offensive and/or inappropriate behavior not only compromises the integrity and ability of the entire Board of Chosen Freeholders to govern; it also undermines the integrity of the County's employment relationship; compromises equal employment opportunities; weakens morale; and interferes with work productivity of the Board and County employees at all levels of the County government; and

WHEREAS, before taking office as County Freeholder on January 3, 2013, and January 6, 2016, John P. Curley took an Oath of Office to support and bear true faith to the Constitutions of the United States and the State of New Jersey and to faithfully, impartially and justly perform all duties of the office of Freeholder in and for the County of Monmouth; and

WHEREAS, the Board of Chosen Freeholders is of the opinion that Freeholder Curley has directly undermined and trivialized the County's policy against workplace discrimination and harassment by the following actions:

- Making false statements to an independent investigator that he does not use vulgar, profane or strong language in public or private, conversely Freeholder Curley himself, has previously bragged to the media in video interviews about calling an elected official a

“fat motherf****r”, and admitted to the investigator that he angrily shouted at a female County employee while in the workplace;

- Making comments of a sexual and vulgar nature to a fellow elected official during a public speech at an event attended by numerous County employees;
- Denying to the independent investigator that he made the above-referenced statement, despite being well-aware of the number of witnesses to the statement;
- The investigator found that Freeholder Curley likely engaged in angry vulgar outburst causing female County employees to flee their offices based upon an independent review of the public meeting recordings;
- Publicly criticizing County employees in the presence of other County employees;
- The investigator noted that two different female County employees recounted overhearing telephone conversations of Freeholder Curley, which focused on the physical appearance of, and ethical commitments about, women;
- The investigator also noted that it has been alleged that Freeholder Curley made many other vulgar and sexual statements, such as: “I will go down on you and I won’t have to send you a message”; “On that if you who I wanted to bend over and take”; “****”; how to “suck a pipe” to a manager; “I’ll show you a snake show, sit on my lap and I’ll give you a show”; if proven to be true, such statements are disgusting, reprehensible, shocking, and should never be made by anyone, let alone a County Freeholder;
- Attempting to excuse such conduct by declaring the Freeholders are not subject to the County policy against workplace discrimination and harassment;
- Filing a lawsuit against the County of Monmouth and its Freeholders for alleged civil rights violations in the independent investigation, despite having been represented by his own legal counsel throughout the investigation process;
- Since Freeholder Curley filed his lawsuit, it has been revealed that Freeholder Curley has allegedly utilized the word “faggot” and “queer” in front of and referring to County employees;
- Making a public statement discrediting the County Freeholders and the independent investigation in a press release on December 1, 2017; while at the same time attempting to prevent the County Freeholders from responding to his statement by seeking a restraining order;
- Publicly downplaying his conduct, by explaining that he doesn’t “mince words,” and admitting that it “is a problem I have”, yet failing to take any action to fix this problem.

WHEREAS, the aforementioned statements actions and conduct of Freeholder Curley goes beyond spirited public debate on matters of public interest and concern are not; and

WHEREAS, the Board of Chosen Freeholders have on numerous occasions requested that Freeholder Curley refrain from continuing with certain behavior; and to work with all Freeholders and County employees in a professional and respectful manner; and

WHEREAS, Freeholder Curley has repeatedly ignored these requests, and continues to behave in a manner detrimental to the County and frustrates the process of the Freeholder's meetings and ability to govern; and

WHEREAS, the Board of Chosen Freeholders are of the opinion that the actions of Freeholder John P. Curley are detrimental to the Board and the County as a whole; amount to conduct unbecoming of a public official; directly and indirectly undermine the ability and authority of other County Freeholders, County officers and County employees to perform and carry-out their responsibilities to the County and the public; directly threatens the morale of the Board of Chosen Freeholders, and all County officers and employees; directly undermines the County's internal workplace policies against discrimination and harassment; and have otherwise forced the County to expend funds to assure that such conduct is immediately rectified and eliminated; and

WHEREAS, Freeholder Curley, by his conduct in the workplace and around County employees, has exposed the Board of Chosen Freeholders to potential liability; and

WHEREAS, the Board of Chosen Freeholders respect and rely upon transparent and open communications and conversations between each Freeholder in order to serve the County and its residents most efficiently and in a cost-effective manner; and

WHEREAS, the Board of Chosen Freeholders expects all Board members to work together and bring to light any issues that affect the County, and not resort to unnecessary litigation; and

WHEREAS, the Board of Chosen Freeholders is of the opinion that actions of Freeholder Curley are reprehensible, offensive, unbecoming of an elected official, and compromise the integrity of Freeholder Curley's office and the Board as a whole, such that Freeholder Curley is worthy of censure requiring formal reprimand; and

WHEREAS, the majority of the Board of Chosen Freeholders wish to express in a public forum their opinion of dissatisfaction with Freeholder Curley's unacceptable conduct as aforesaid; and

WHEREAS, the Board of Chosen Freeholders has chosen the within resolution and public reprimand in lieu of pursuing other available avenues or litigation, such as filing an ethics complaint with the Local Finance Board for allegations of violations of the Local Government Ethics Law, and otherwise disavow the pursuit of any formal process in order to avoid the additional expenditure of Taxpayers' funds at this time.

NOW THEREFORE BE IT RESOLVED, that the Board of Chosen Freeholders of the County of Monmouth do hereby censure and reprimand Freeholder John P. Curley for his behavior.

BE IT FURTHER RESOLVED, that a copy of this Resolution shall be published as required by law, within ten (10) days of its passage.

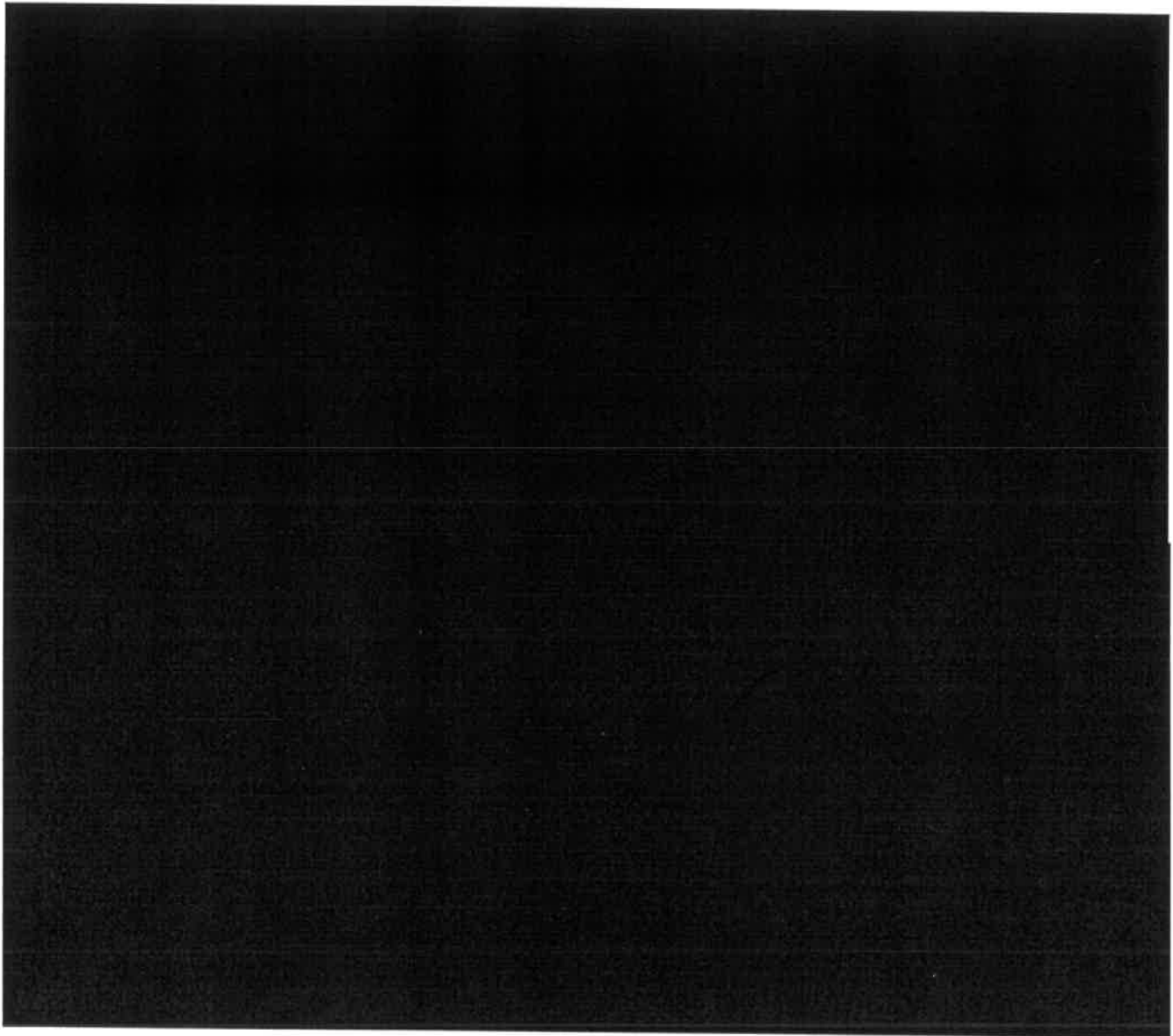
I HEREBY CERTIFY this to be a true and correct Resolution of the Board of Chosen Freeholders of the County of Monmouth and adopted on _____.

Approved:

Attest:

CLERK OF THE BOARD

EXHIBIT G



-----Original Message-----

From: Monmouth County Republican Headquarters <monmouthrepublican@gmail.com>

To: Monmouth County Republican Headquarters <monmouthrepublican@gmail.com>

Sent: Wed, Dec 13, 2017 3:04 pm

Subject: Important: Please Read

Friends,

On Friday, Freeholders Burry, Amone, DiMaso, and Rich took the unprecedented and difficult action to censure John Curley after an investigation into complaints by county employees of harassment and improper conduct. This action was not taken lightly, rather it was taken with careful deliberation and thorough legal consultation. The Freeholders took this action to protect the Monmouth County taxpayers from John's reckless

behavior and to protect the integrity of Monmouth County government. John hired a Democratic State committee lawyer to represent him throughout the investigation and even filed a lawsuit against the county and his fellow Republican freeholders in federal court in an effort to prevent these issues from coming to light.

The Censure by the Freeholders relied upon the findings of a former Acting Justice of the New Jersey Supreme Court who found that Mr. Curley made sexual and vulgar comments about a female elected official in front of county employees, publicly criticized county employees in the presence of other county employees, spoke critically in the presence of county employees about the physical appearance of certain women, and that there have been allegations that John used the following inappropriate language to, about, or in front of women and/or other county employees:

"C*nt"; "Bi*ch"; "Fa*got"; "Qu*ers"; "I'll show you a snake show, sit on my lap and I'll give you a show"; "I will go down on you and won't have to send you a message."; "Oh that's you who I wanted to bend over and take"; telling a teenager how to "sweat a pipe."

The censure also states that the investigation revealed John admitted to angrily shouting at a female county employee while in the work place, and that John likely engaged in "angry vulgar outbursts causing female county employees to flee their offices."

Although John has done good works during his tenure as a public servant, we cannot stand for, ignore, or condone this reprehensible behavior. As a party that embraces and supports women, diversity, and equality, we cannot allow the subjecting of county employees, female elected officials, or anyone else for that matter, to intimidation, vulgar language, discriminatory slurs and sexual innuendo.

Attached is the resolution that was passed on Friday. Please take a moment to review it. This type of behavior cannot be tolerated by the Freeholders or the party, and John should not run for re-election on the Republican line in 2018.

Shaun Golden
Chairman
Monmouth County Republican Committee
(732)431-6664 Office
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